

CASE NO. 18-1170

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

SHAMROCK FOODS COMPANY,

Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent,

and

BAKERY, CONFECTIONERY, TOBACCO WORKERS' AND GRAIN
MILLERS INTERNATIONAL UNION, LOCAL UNION NO. 232,
AFL-CIO-CLC

Proposed Intervenor.

MOTION TO INTERVENE

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UNION NO. 232, AFL-CIO-CLC

BAKERY, CONFECTIONERY, TOBACCO WORKERS' AND GRAIN MILLERS INTERNATIONAL UNION, LOCAL UNION NO. 232, AFL-CIO-CLC, the Proposed Intervenor in this matter, hereby moves this Court for an Order permitting it to intervene in support of Respondent in the proceeding in *Shamrock Foods Company v. National Labor Relations Board*, Case No. 18-1170.

Intervention is sought under Federal Rule of Appellate Procedure 15.

Normally, charging parties such as BAKERY, CONFECTIONERY, TOBACCO WORKERS' AND GRAIN MILLERS INTERNATIONAL UNION, LOCAL UNION NO. 232, AFL CIO CLC are permitted intervention in these proceedings seeking review of an Order of the National Labor Relations Board. See *International Union, UAW, Local 283 v. Scofield* (1965) 382 U.S. 205, 208. Indeed, *Scofield* holds that charging parties such as BAKERY, CONFECTIONERY, TOBACCO WORKERS' AND GRAIN MILLERS INTERNATIONAL UNION, LOCAL UNION NO. 232, AFL CIO CLC are normally entitled to intervention in the Circuit Court.

Dated: July 12, 2018

Respectfully Submitted

By: /s/ David A. Rosenfeld
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Attorneys for Proposed INTERVENOR
BAKERY, CONFECTIONERY,
TOBACCO WORKERS' AND GRAIN
MILLERS INTERNATIONAL UNION,
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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction this service was made. I am over the age of eighteen years and not a party to the within action.

On July 12, 2018, I served the following documents in the manner described below:

MOTION TO INTERVENE

- ☒ (BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from kkempler@unioncounsel.net to the email addresses set forth below.

On the following part(ies) in this action:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 12, 2018, at Alameda, California.

/s/ Karen Kempler
Karen Kempler